

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA

In re:

Pro-Mark Services, Inc.,

Bky. Case No. 24-30167
Chapter 7

Debtor.

Erik A. Ahlgren, as Chapter 7 Trustee
of the Bankruptcy Estate of Pro-Mark Services, Inc.,
as Administrator of the Pro-Mark
Services, Inc. Employee Stock Ownership Plan, and
as Trustee of the Pro-Mark Services, Inc.
Employee Stock Ownership Trust,

Plaintiff,

v.

Adversary No. 24-07014

Connie Berg, Kyle Berg, Connie Berg Revocable
Living Trust, Kyle R. Berg Revocable Living Trust,
Chad DuBois, and Miguel Paredes,

Defendants.

**STIPULATED MOTION TO EXTEND
RESPONSE PERIOD TO SECOND AMENDED COMPLAINT**

1. Plaintiff Erik A. Ahlgren, as Chapter 7 Trustee of the Bankruptcy Estate of Pro-Mark Services, Inc., as Administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan, and as Trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust filed his *Second Amended Complaint* (the “Second Amended Complaint”) [Doc. 120] against the Defendants, including Defendant Miguel Paredes, on May 20, 2025.

2. The Court previously extended Defendant Paredes' deadline to file an answer or other response to the Second Amended Complaint to July 17, 2025, to enable Plaintiff and Defendant Paredes to engage in good faith settlement discussions. [See Doc. 137.]

3. Plaintiff and Defendant Paredes continue to engage in good faith settlement discussions. To facilitate those settlement discussions, Plaintiff and Defendant Paredes hereby move the Court, by stipulation, for an order further extending the deadline for Defendant Paredes to file an answer or other response to the Second Amended Complaint to August 1, 2025.

Dated: July 17, 2025

/e/ Peter D. Kieselbach

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Dated: July 17, 2025

/s/ Michael L. Scheier

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Attorneys for Defendant Miguel Paredes

CERTIFICATE OF SERVICE

The undersigned certifies that on July 17, 2025, the above document was served on all counsel of record via CM/ECF.

/e/ Peter D. Kieselbach
Peter D. Kieselbach